

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA**

**WANDA COOPER in her individual capacity
and as administrator of the estate of the
decedent AHMAUD ARBERY**

Plaintiff

v.

TRAVIS McMICHAEL et al.,

Defendants.

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**Civil Action
2:21-CV-20-LGW-BWC**

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION TO STAY**

COMES NOW Plaintiff Wanda Cooper and responds to Defendants' Motions to Stay Discovery Pending Resolution of Motions to Dismiss and related criminal proceedings. In support of this Response, Plaintiff avers as follows:

1. Glynn County Robert Rash, George Barnhill, Travis McMichael, Gregory McMichael, and William Bryan filed Motions to Stay Discovery pending the resolution of Motions to Dismiss and the criminal proceedings of Co-Defendants on June 12, 2021. ¹ (Docs. 68,69,70,73,74,77)

2. Plaintiff acknowledges that Defendants Travis McMichael, Gregory McMichael, William Bryan, and Jackie Johnson have pending criminal proceedings that overlap factually with this matter.

¹ At the time that Defendant Glynn County filed their Motion to Stay, Defendants Travis McMichael, Gregory McMichael, and William Bryan had pending criminal charges. Defendant Jackie Johnson now has pending criminal charges as well.

3. Plaintiff also acknowledges that Defendants Robert Rash and George Barnhill raise immunity defenses within their Motions to Dismiss.

4. Plaintiff therefore acknowledges that at this specific procedural posture a stay of discovery is appropriate.

5. Plaintiff's respectfully request that this honorable court narrowly tailor its Order Staying Discovery to the current procedural posture and permit Plaintiff to petition the court to Vacate the Order if the procedural posture changes including the resolution of the pending criminal matters.

Respectfully Submitted

//s// Mark V. Maguire
Mark V. Maguire, Esquire
McELDREW YOUNG PURTELL
123 South Broad Street
Philadelphia, PA 19109

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CERTIFICATE OF SERVICE

I hereby certify that I will make a true and correct copy of Plaintiff's Response
Defendants' Motions to Stay available on the PACER ECF system which will send an electronic
notice to all participating counsel of record.

//s// Mark V. Maguire
Mark V. Maguire, Esquire
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